

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT HOSSFELD and WES NEWMAN,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No. 1:24-cv-02613

Honorable Jeffrey I Cummings

**DEFENDANT ALLSTATE INSURANCE COMPANY'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE,
ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 5.3(a), defendant Allstate Insurance Company ("Allstate"), hereby moves the Court for an Order granting an extension of thirty (30) days, through and including May 24, 2024, for Allstate to move, answer or otherwise respond to the Complaint filed by plaintiffs Robert Hossfeld and Wes Newman ("Plaintiffs"). Plaintiffs do not oppose the relief requested herein. As grounds for its motion, Allstate states as follows:

1. On April 1, 2024, Plaintiffs filed their Complaint, which alleges claims against Allstate for violations of the TCPA.
2. Allstate was served with a Summons and a copy of the Complaint on April 4, 2024.
3. Allstate requests an extension of thirty (30) days, through and including May 24, 2024, to move, answer or otherwise respond to the Complaint. The additional time is needed for Allstate and its counsel to review the matter, including the extensive docket activity in a prior lawsuit filed by Plaintiff Hossfeld against Allstate, and to prepare Allstate's response.

4. Rule 6(b)(1)(A) states: “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time: with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.”

5. Allstate is filing this Motion prior to the expiration of the deadline for it to move, answer or otherwise respond to the Complaint. (*See* [ECF No. 5]).

6. Allstate makes this Motion in good faith and an extension of time to respond is in the interest of both the parties and judicial economy. The extension is not sought for the purposes of delay.

7. Moreover, counsel for Allstate conferred with Plaintiffs’ counsel regarding the requested extension via e-mail on April 18, 2024, and Plaintiffs’ counsel stated that he does not oppose the requested extension.

8. Accordingly, Allstate asks that the Court extend the deadline for Allstate to move, answer or otherwise respond to the Complaint for thirty (30) days, through and including May 24, 2024.

WHEREFORE, defendant Allstate Insurance Company respectfully requests that this Court enter an Order granting an extension of time, through and including May 24, 2024, for Allstate to move, answer or otherwise respond to the Complaint.

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that on April 18, 2024, Ryan Roman, counsel for defendant Allstate Insurance Company, e-mailed Alexander Burke, counsel for plaintiffs Robert Hossfeld and Wes Newman, regarding the requested extension of time. Plaintiffs’ counsel stated that Plaintiffs do not oppose the requested extension of time.

Dated: April 19, 2024

Respectfully submitted,

AKERMAN LLP

/s/Jani K. Mikel

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- and -

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Counsel for Defendant Allstate Insurance Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 19, 2024, the foregoing document was filed with the Court's electronic filing system on the CM/ECF system which will send a notice of electronic filing to all counsel of record.

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